IN AND BEFORE THE OKLAHOMA STATE BOARD OF MEDICAL LICENSURE AND SUPERVISION STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel., THE OKLAHOMA STATE BOARD OF MEDICAL LICENSURE AND SUPERVISION,	FILED
SUI ERVISION,	MAR 1 8 2021
Plaintiff,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION Case No. 20-11-5943
* D*)
ALEXANDER JOVANOVICH, M.D.,	Ś
LICENSE NO. MD 33275,)
)
Defendant.)

VERIFIED COMPLAINT

The State of Oklahoma, ex rel., the Oklahoma State Board of Medical Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against ALEXANDER JOVANOVICH, M.D. ("Defendant"):

I. JURISDICTION

- 1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. § 480 *et seq.*
- 2. Defendant, holds Oklahoma medical license number 33275. The acts and omissions complained of herein were made while Defendant was acting as a physician pursuant to the medical license conferred upon him by the State of Oklahoma, and such acts and omissions occurred within the physical territory of the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

- 3. On September 23, 2020, The Iowa Board of medicine notified the Oklahoma Medical Board of action taken against Defendant concerning his practice of telemedicine. Defendant self-reported the same information to the Oklahoma Medical Board on September 30, 2020.
- 4. On October 21, 2020, Board Investigator Carter contacted the Iowa Board of Medicine to request a copy of their investigative materials. Through those materials it was discovered that Defendant's telemedicine practice involved a medication called "Blue Chews" which is a compounded equivalent to Viagra which requires a prescription but is not listed as a CDS. Defendant was based in the state of Illinois and was charged by the Iowa Board of

Medicine with prescribing this medication to people with whom he had never established a valid doctor-patient relationship. Such a doctor-patient relationship is required in Oklahoma.

5. Defendant entered into a settlement agreement regarding the allegations against him by the Iowa Board of Medicine in which he was cited for violating the standards of practice for telemedicine in Iowa, received a \$5,000 fine and was required to develop procedures to ensure he complies with the Iowa telemedicine requirements and provide proof of the same to the Iowa Board of Medicine.

III. VIOLATIONS

- 6. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
 - a. Disciplinary action of another state or jurisdiction against a license or other authorization to practice medicine and surgery based upon acts of conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section, a certified copy of the record of the action taken by the other state or jurisdiction being conclusive thereof in violation of OAC 435:10-7-4(31):

CONCLUSION

Given the foregoing, the undersigned requests the Board conduct a hearing, and, upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation and any other appropriate action with respect to the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Joseph L. Ashbaker, OBA No. 19395

Assistant Attorney General

OKLAHOMA STATE BOARD OF MEDICAL

LICENSURE AND SUPERVISION

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VERIFICATION

I, Lawrence Carter, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding the Defendant, ALEXANDER JOVANOVICH, M.D.; and

2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

Lawrence Carter, Investigator

OKLAHOMA STATE BOARD OF MEDICAL

LICENSURE AND SUPERVISION

Date: 19 July 2021